



Eric M. Creizman

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By ECF and Email

June 22, 2022

The Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED
SO ORDERED


John G. Koeltl, U.S.D.J.

6/23/22

Re: United States v. James Jeremy Barbera, 21-CR-154 (JGK)

Dear Judge Koeltl:

On consent of the government, we respectfully request a further and *final* extension of Mr. Barbera's deadline to file his reply papers in support of his post-trial motions under Rule 33 of the Federal Rules of Criminal Procedure until Monday, June 27, 2022.

The reply brief was originally due on Monday, June 13, 2022. The Court granted Mr. Barbera's request for an extension of that deadline to Monday, June 20, 2022, which was a Court holiday and therefore the deadline was June 21, 2022. As I reported in my previous letter, Ms. Madrigal and I have been traveling to and from Los Angeles in connection with a criminal case pending in the Central District of California. While in Los Angeles, much of our days have involved meeting with a client in the Metropolitan Detention Center Los Angeles, where, of course, we do not have access to cell phones or email. As a result, we have not been able to sufficiently communicate with Mr. Barbera to receive his input and commentary on the draft submission. Extending the deadline for the reply to Monday, June 27, 2022 will enable us to adequately confer with Mr. Barbera before filing the submission.

This is Mr. Barbera's second request for an extension of the deadline to file his reply to in support of his post-trial motions. In addition to granting Mr. Barbera's first extension of the deadline to submit the reply brief, the Court previously granted two requests by Mr. Barbera to extend the deadline to file his opening papers. The Court also granted two requests by the government to extend its time to file its opposition to Mr. Barbera's post-trial motions.

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We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Eric M. Creizman
Eric M. Creizman (EC7684)

cc: AUSAs Kiersten Fletcher and Daniel Loss (by ECF and email)
United States Probation Officer Johnny Y. Kim (by email)